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12 JOSE FERNANDO GOMEZ-MOREIRA

13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16
17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 vs.
20 JOSE FERNANDO GOMEZ-
21 MOREIRA,
22 Defendant.

23 Case No. 1:20-cr-00151-NONE-SKO

24 **STIPULATION TO CONTINUE STATUS
25 CONFERENCE**

26 Date: March 17, 2021
27 Time: 1:00 p.m.
Judge: Hon. Sheila K. Oberto

28 The parties, through their respective counsel, Laura Withers, Assistant United States
Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender,
counsel for the defendant, Jose Fernando Gomez-Moreira, hereby stipulate and jointly move this
Court to continue Mr. Gomez-Moreira's status conference from February 17, 2021 to March 17,
2021.

29 The defense is still awaiting receipt of records necessary to Mr. Gomez-Moreira's case
30 from the Executive Office of Immigration Review. On December 17, 2020, defense counsel
31 received assurances that the requested records would be expedited. Despite these assurances the
32 records have yet to arrive. Defense investigators have renewed their efforts to secure records as
33 quickly as possible.

34 The parties request this continuance with the intention of conserving time and resources

1 for both the parties and the Court. The parties agree that the delay resulting from the continuance
2 shall be excluded in the interests of justice, including but not limited to, the need for the period
3 of time set forth herein for effective defense preparation, defense investigation, and plea
4 negotiation purposes pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

5 Respectfully submitted,

6 McGREGOR SCOTT
7 United States Attorney

8 Dated: February 10, 2021

/s/ Laura Withers
9 LAURA WITHERS
10 Assistant U.S. Attorney

11 Dated: February 10, 2021

12 HEATHER E. WILLIAMS
13 Federal Defender

14 /s/ Benjamin A. Gerson
15 BENJAMIN A. GERSON
16 Assistant Federal Defender
17 Attorney for Defendant
18 JOSE FERNANDO GOMEZ-MOREIRA

19 **O R D E R**

20 **GOOD CAUSE APPEARING**, the above stipulation to continue case 1:20-cr-00151 to
21 March 17, 2021, is hereby accepted and adopted as the order of this Court.

22 IT IS SO ORDERED.

23 Dated: February 11, 2021

/s/ Sheila K. Oberlo
24 UNITED STATES MAGISTRATE JUDGE

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